

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII**

BENITA BROWN, as individual and on  
behalf of all others similarly situated,

Plaintiff,

vs.

PORTER, MCGUIRE, KIAKONA &  
CHOW LLP, a Hawai'i limited liability  
partnership, and ASSOCIATION OF  
APARTMENT OWNERS OF  
TERRAZZA/CORTEBELLA/LAS  
BRISAS/TIBURON, a Hawai'i  
corporation, as individual entities and on  
behalf of all others similarly situated; DOE  
DEFENDANTS 1-100,  
Defendants.

Civil No. 1:17-cv-00554-LEK-KSC

**DECLARATION OF STEVEN  
K. S. CHUNG; EXHIBIT "A"**

Trial Judge: Leslie E. Kobayashi  
Trial Date: April 2, 2019

**DECLARATION OF STEVEN K. S. CHUNG**

I, STEVEN K. S. CHUNG, declare as follows:

1. I am an attorney admitted to practice before this Court and all courts in the State of Hawaii, and represent the Plaintiff in this matter.
2. A true and correct copy of the proposed Third Amended Complaint is attached hereto as Exhibit "A."
3. The proposed amendments consist entirely of the highlighted text in Exhibit "A," and are found in paragraphs 58 and 65-71 of the proposed complaint.

4. In a related case which presented substantively similar issues and claims, *Galima v. Ass'n of Apartment Owners of Palm Court, et al.*, No. 16-cv-00023 LEK-KSC, the Association of Apartment Owners of Palm Court ("Palm Court") responded to plaintiffs Rudy Akoni Galima and Roxana Beatriz Galima's requests for interrogatories and requests for production of documents on November 13, 2017.

5. Palm Court indicated in its answers to interrogatories that Palm Court had purchased the Galimas' apartment for \$1, and that Palm Court was renting out the Galimas' apartment for \$1,500 a month.

6. Plaintiff believes the AOAO Defendants in this case took similar actions by purchasing apartments at its own foreclosure sales for nominal prices and similarly received an economic benefit (such as rental income) from the apartments that far exceeded the prices the AOAO Defendants paid to purchase the apartments.

7. As of this date, no discovery requests have been served upon the Plaintiff in the present case.

I, STEVEN K. S. CHUNG, declare under penalty of perjury that the foregoing is true and correct to the best of my ability and is based upon personal knowledge.

DATED: Honolulu, Hawaii, January 24, 2018.

/s/ Steven K. S. Chung